

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT WASHINGTON  
AT SEATTLE

KENNETH I. DEANE,

Plaintiff,

vs.

PACIFIC FINANCIAL GROUP, Inc., a  
Washington corporation, MEGAN P. MEADE,  
an unmarried woman; NICOLAS B. SCALZO,  
a married man; NICOLAS B. SCALZO an  
unmarried man; JAMES C. MCCLENDON, a  
married man; JAMES C. MCCLENDON and  
JOAN A. MCCLENDON, a marital community;  
GAETAN T. SCALZO, a married man;  
GAETAN T. SCALZO and SHERRIE  
SCALZO, a marital community,

Defendants.

Cause No. 2:19-cv-00722-MJP

**STIPULATED MOTION FOR AND  
ORDER AMENDING TRIAL DATE  
AND RELATED DATES**

**NOTED FOR CONSIDERATION:  
MARCH 5, 2020**

Plaintiff Kenneth Deane ("Plaintiff") and Defendants The Pacific Financial Group, Megan Meade, Nicolas Scalzo, James McClendon and Gaetan Scalzo ("Defendants"), by and through their respective counsel, stipulate and agree to the following (proposed) amended case schedule and submit the same for consideration as instructed by the Court per its Minute Entry (Dkt. 44) as follows:

EVENT	NEW DATE
JURY TRIAL DATE	October 26, 2020
Reports from expert witnesses under FRCP 26(a)(2) due	June 29, 2020
All motions related to discovery must be filed by and noted on the motion calendar on the third Friday thereafter (see CR7(d))	April 27, 2020
Discovery completed by	May 26, 2020

1 2 3 4 5	All dispositive motions must be filed by and noted on the motion calendar on the fourth Friday thereafter (see CR7(d))  <b>Counsel are reminded of the requirements to provide courtesy copies of any motions with exhibits or other attachments exceeding 50 pages. Compliance with this requirement will facilitate timely consideration of your motion.</b>	June 22, 2020
6 7	All motions in limine must be filed by and noted on the motion calendar no earlier than the third Friday thereafter and no later than the Friday before the pretrial conference.	September 28, 2020
8	Agreed pretrial order due	October 14, 2020
9	Trial briefs, proposed voir dire questions, and proposed jury instructions	October 14, 2020
10 11	Pre-trial conference	October 20, 2020, at 01:30 PM (pending Court's availability)
12	Length of Jury Trial	6 DAYS

The parties, by and through their undersigned counsel, stipulate to this motion and the following proposed order.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 5<sup>th</sup> day of March, 2020.

GORDON REES SCULLY MANSUKHANI LLP

By: /s/ David W. Silke  
David W. Silke, WSBA #23761  
Nicole E. Demmon, WSBA #45322

**Attorneys for Defendants:**

Pacific Financial Group, Inc.;  
Megan P. Meade; Nicholas B. Scalzo and  
Eva M. Scalzo; James C. McClendon and  
Joan A. McClendon; and Gaetan T. Scalzo and  
Sherrie Scalzo

THE ROSEN LAW FIRM

By: /s/ Jon Howard Rosen  
Jon Howard Rosen, WSBA #7543  
The Rosen Law Firm

**Attorney for Plaintiff:**

Kenneth Deane

**PROPOSED ORDER**

Based on the foregoing joint motion of the parties, and good cause appearing, therefore,

IT IS HEREBY ORDERED THAT the case schedule be amended as follows:

EVENT	NEW DATE
JURY TRIAL DATE	October 26, 2020
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Length of Jury Trial	6 DAYS

1 IT IS SO ORDERED.

2 DATED this \_6th\_ day of March, 2020.

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8 Marsha J. Pechman  
9 United States Senior District Judge

10  
11 Presented by:

12 GORDON REES SCULLY MANSUKHANI, LLP

13 By: /s/ David W. Silke  
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18 Attorneys for Defendants:

19 Pacific Financial Group, Inc.;  
20 Megan P. Meade; Nicholas B. Scalzo and  
21 Eva M. Scalzo; James C. McClendon and  
Joan A. McClendon; and Gaetan T. Scalzo and  
Sherrie Scalzo

22 By: /s/ Jon Howard Rosen  
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